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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO,
S. DE R.L. DE C.V., *et al.*

Debtors in a Foreign Proceeding.

GONZALO GIL-WHITE, PERSONALLY
AND IN HIS CAPACITY AS FOREIGN
REPRESENTATIVE OF PERFORADORA
ORO NEGRO, S. DE R.L. DE C.V. AND
INTEGRADORA DE SERVICIOS
PETROLEROS ORO NEGRO, S.A.P.I. DE
C.V.

Plaintiff,
-against-

ALP ERCIL; ALTERNA CAPITAL
PARTNERS, LLC; AMA CAPITAL
PARTNERS, LLC; ANDRES
CONSTANTIN ANTONIUS-GONZÁLEZ;
ASIA RESEARCH AND CAPITAL
MANAGEMENT LTD.; CQS (UK) LLP;

BK Case No. 18-11094 (SCC)
(Jointly Administered) (Chapter 15)

Adversary Case No. 19-01294 (SCC)

FINTECH ADVISORY, INC.; DEUTSCHE BANK MÉXICO, S.A.; INSTITUCIÓN DE BANCA MÚLTIPLE; GARCÍA GONZÁLEZ Y BARRADAS ABOGADOS, S.C.; GHL INVESTMENTS (EUROPE) LTD.; JOHN FREDRIKSEN; KRISTAN BODDEN; MARITIME FINANCE COMPANY LTD.; NOEL BLAIR HUNTER COCHRANE, JR; ORO NEGRO PRIMUS PTE., LTD.; ORO NEGRO LAURUS PTE., LTD.; ORO NEGRO FORTIUS PTE., LTD.; ORO NEGRO DECUS PTE., LTD.; ORO NEGRO IMPETUS PTE., LTD.; PAUL MATISON LEAND, JR.; ROGER ALAN BARTLETT; ROGER ARNOLD HANCOCK; SEADRILL LIMITED; SHIP FINANCE INTERNATIONAL LTD.; and DOES 1-100

Defendants.

DECLARATION OF JUAN MORILLO

I, Juan P. Morillo, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct:

1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, counsel of record for Fernando Perez Correa Camarena, the Foreign Representative of Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. and Perforadora Oro Negro, S. de R.L. de C.V. in this action.

2. I am a member in good standing of the State Bars of the District of Colombia and the State of Florida, and I am *pro hac vice* admitted to practice in this Court.

3. I respectfully submit this declaration in support of the *Opposition to Defendants' Motions to Dismiss the Complaint*.

4. Exhibit 1 to this Declaration is a true and correct copy of the minutes of the September 12, 2019 Singapore appellate court decision.

5. Exhibit 2 is a true and correct copy of correspondence with counsel to the Ad-Hoc Group and (at the time) the Singapore Rig Owners.

6. Exhibit 3 is a true and correct copy of documents with bates numbers ORO-NEGRO-AMA_00001142-1147 produced in this underlying Chapter 15 proceeding.¹

7. Exhibit 4 is a true and correct copy of documents with bates numbers ORO-NEGRO-AMA_00004411-4418 produced in this underlying Chapter 15 proceeding.

8. Exhibit 5 is a true and correct copy of documents with bates numbers ORO-NEGRO-AMA_00044247-44248 produced in this underlying Chapter 15 proceeding.

9. Exhibit 6 is a true and correct copy of documents with bates numbers ORO-NEGRO-AMA 00022190-22194 produced in this underlying Chapter 15 proceeding.

10. Exhibit 7 is a true and correct copy of documents with bates numbers ORO-NEGRO-AMA_00031541-31543 produced in this underlying Chapter 15 proceeding.

11. Exhibit 8 is a true and correct copy of the Declaration of Mark Morris, Chief Financial Officer of Seadrill Limited, In Support of Chapter 11 Petitions and First Day Motions at 17, *In re: Seadrill Limited, et al.*, No. 17-60079 (Bankr. S.D. Tex. Sept. 12, 2017).

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¹ Exhibits 2 to 7 of this Declaration have been filed in redacted format in accordance with the governing protective order (ECF 104) in the underlying Chapter 15 proceeding.

Dated: October 25, 2019

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